

Exhibit A



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February 27, 2023

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VIA EMAIL

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Re: *In re: Google Digital Advertising Antitrust Litigation*, No. 1:21-md-03010 (PKC)

Counsel:

Contemporaneously with this letter, Google is serving its Responses and Objections to Plaintiffs' First Set of Requests for Production of Documents to Defendants (the "Requests").¹ I write to share additional details about Google's proposal for identifying custodial documents and data responsive to the Requests and to offer to meet and confer about Google's plans for substantially completing its production of responsive materials by May 30, 2023. This letter is Confidential Information, and Google's Responses and Objections are Highly Confidential Information under the terms of the governing Confidentiality Order. ECF No. 297.

As you know, Google has already produced approximately 2.25 million documents in these Actions. In setting the deadline for substantial completion, Judge Castel recognized "the substantial document production that has already been made in these [A]ctions." ECF No. 394 ¶ 5. In addition to that substantial document production, on or before May 30, 2023, Google will produce approximately 800,000 documents it produced to the Department of Justice ("DOJ") in

¹ At 5:31 pm on the day that these Responses and Objections were due, State Plaintiffs filed a letter with the Court giving notice of their intent to file with the JPML a Motion to Remand to the Eastern District of Texas. ECF No. 477. Google's Responses and Objections are based on and made pursuant to the current case management procedures, including the Court's direction that the Discovery Steering Committee prepare discovery requests that are "common" to all Plaintiffs. ECF No. 311 ¶ 3. Google reserves the right to make additional objections and to amend its responses should the governing case management procedures change.

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the DOJ's ad tech investigation that have not yet been produced in these Actions (the "Additional Ad Tech Investigation Materials").² Additionally, Google proposes to take the steps set forth below to produce what, together with the documents described in this paragraph, are referred to as the "Expanded Investigation Materials."

To produce as many responsive documents as possible by May 30, 2023, Google proposes to use the search terms previously negotiated by the DOJ in its ad tech investigation and by the Texas Office of the Attorney General (the "Texas OAG") in its ad tech investigation (together, the "Investigation Search Terms"). *See* Appendix A.³ The Investigation Search Terms subsume the vast majority of the Requests and are the result of intensive negotiations with the DOJ and Texas OAG. Moreover, negotiating new search terms and custodians from scratch would be impracticable in light of the May 30, 2023 deadline to substantially complete production of documents in response to the Requests. *See* ECF No. 394 ¶ 6.1.

Google proposes to apply the Investigation Search Terms to 119 custodians (the "Ad Tech Custodians"). *See* Appendix B. The Ad Tech Custodians include 113 DOJ ad tech custodians; all 39 custodians in the Texas OAG ad tech investigation (all but three of which overlap with the DOJ ad tech custodians); and three additional custodians.⁴ Regardless of whether a particular custodian was a DOJ ad tech custodian, a Texas OAG custodian, or neither, Google proposes to apply all Investigation Search Terms to all Ad Tech Custodians.

Google proposes to apply the Investigation Search Terms to documents collected from the Ad Tech Custodians across a ten-year period running from January 1, 2013, through January 27, 2023, the date of the Requests. Google has applied the same date restriction to the first requests for production it served on State Plaintiffs and the third party subpoenas it has served to date.⁵

² On February 7, 2022, the Court ordered Google to produce all documents it had already produced to the State of Texas and to private plaintiffs in an action in the Northern District of California prior to consolidation of this MDL. ECF No. 244 at 4. The Additional Ad Tech Investigation Materials were not included in that set because they had not been produced to Texas or any private plaintiffs. *See* ECF No. 244 at 3 (noting that there is a separate DOJ investigation and that the Court "did *not* order Google to also produce the documents that were sought by the DOJ; the production to plaintiffs was limited to the documents that had been produced to the state of Texas which were also said to be the documents it had produced to plaintiffs in the Northern District of California." (emphasis added)).

³ Google has removed from the previously negotiated Investigation Search Terms only (1) terms related to the Facebook Network Bidding Agreement, as to which discovery has been stayed, and (2) references to YouTube, which is not at issue in these Actions.

⁴ [REDACTED] and [REDACTED] have been added because they were on Google's initial disclosures. [REDACTED] has been added because her documents may be responsive to Plaintiffs' requests for financial information (Request Nos. 270 and 271).

⁵ To the extent Plaintiffs contend that earlier time periods have some relevance, certain of the Investigation Search Terms were run for earlier date ranges during the investigations, so Plaintiffs already possess documents from those

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As Google has advised the Court, Google believes that the sheer breadth of the Requests and Plaintiffs' failure to account for the discovery they already possess runs afoul of Federal Rule of Civil Procedure 26(g). *See* ECF No. 441 at 3. Nonetheless, as explained in its Responses and Objections, Google agrees to meet and confer in good faith regarding additional targeted searches tailored to Plaintiffs' Requests.⁶ The majority of the Requests, however, do not require additional searches because of the comprehensive scope of the Expanded Investigation Materials. As Appendix A shows, Google has already run and will now refresh its extensive searches in connection with all relevant Google ad tech products.

To produce as many responsive documents as possible by May 30, 2023, Google already has commenced its review in accordance with the proposal set forth herein. To the extent Plaintiffs intend to propose modifications or a list of additional terms beyond those previously negotiated with the DOJ and Texas OAG, please do so in writing by March 13, 2023. *See* ECF No. 436-2 ¶ III.2. Google is currently available to meet and confer regarding Plaintiffs' Requests on March 20, 2023, from 1:30 pm to 5:30 pm; March 21, 2023, from 9:00 am to 1:00 pm; March 23, 2023, from 11:00 am to 4:00 pm; or March 24, 2023, from 10:00 am to 4:00 pm.

In its Responses and Objections, Google also has proposed to produce extensive quantities of transaction-level and aggregated data in response to Requests 20, 21, 22, 116, 159, 243, and 247 (the "Data Requests"). By March 13, 2023, please confirm that those productions would constitute complete responses to the Data Requests or identify with specificity any additional information Plaintiffs contend should be included. Google is currently available to meet and confer regarding the Data Requests, as well as Requests 195, 239, 240, 244, 245, 261, and 296, on March 1, 2023, from 9:00 am to 12:00 pm; March 3, 2023, from 10:00 am to 5:00 pm; March 6, 2023, from 1:00 pm to 5:00 pm; March 8, 2023, from 9:00 am to 11:00 am; or March 10, 2023, from 10:00 am to 5:00 pm.

Sincerely,

/s/ Justina K. Sessions

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Jonathan Jacobson

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periods. For example, while Plaintiffs make allegations regarding the acquisition of DoubleClick, the Texas OAG already sought and received documents related to Google's acquisition of DoubleClick. By producing these documents, Google does not concede the relevancy of this earlier time period.

⁶ Because the Requests include numerous references to RASTA, Google has in good faith added to the Investigation Search Terms documents related to RASTA, even though the DOJ ad tech investigation search terms already included sweeping searches for documents related to experiments and tests regarding Google's ad tech products.

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APPENDIX A

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(Head* /5 bid*) OR “PreBid” OR “Poirot” OR “Elmo” OR Banksy OR HBGY OR HBYG OR (HB /20 (ad OR ads OR advertis* OR pub OR pubs OR publisher* OR SSP* OR exchange* OR DSP* OR Amazon OR AMZN OR TAM OR Facebook OR FB OR FAN)) OR “HB Yield Group” OR (IAB w/2 (head* w/5 bid*))

((third* /3 part*) OR 3P OR Freewheel OR “Free Wheel” OR “Non Google” OR nongoogle OR compet* OR rival*) /30 (integrat* OR compatib* OR support* OR contract* OR allow OR agreement*) /30 (Search OR AdSense OR AdX) OR ((DBM OR DV3 OR DV360 OR video OR platform OR AdX OR GAM) AND (consolidat*)) OR (consolidat* w/10 metric*) OR ((DBM OR DV3 OR DV360) AND increment*) OR ((DBM OR DV3 OR DV360 OR video OR platform OR AdX OR GAM OR AdSense) w/10 (inventory w/2 (quality OR signal*))) OR ((clean* OR dirt* OR risk* OR IVT OR invalid) w/2 (traffic OR fraud* OR spam*))

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((integrat* OR combin* OR unif* OR consolidat* OR incorporat* OR join* OR link* OR interfac* OR interop* OR fold* OR rebrand*) /5 ((“Google Marketing Platform” OR GMP) /10 ((“Google Analytics” OR GA360 OR “Analytics 360”) OR (DoubleClick OR DBM OR DCM) OR DV360 OR “Display & Video 360”)))
((integrat* OR combin* OR unif* OR consolidat* OR incorporat* OR join* OR link* OR interfac* OR interop* OR fold* OR rebrand*) /5 ((“Google Ad Exchange” OR AdX) /10 (AdMob OR “Invite Media”)))
(((complain* OR angry OR mad OR upset* OR problem* OR unfair OR exploit* OR leverage* OR harm* OR hurt* OR protest* OR oppose* OR object* OR annoy* OR dissatisfied OR dissatisfaction OR disadvantage* OR degrad* OR disfavor*) /5 (“Google Ad Exchange” OR AdX OR DRX)) OR ((minimum /5 spend) /5 (“Ad Exchange” OR AdX)))
((complain* OR angry OR mad OR upset* OR problem* OR unfair OR exploit* OR leverage* OR harm* OR hurt* OR protest* OR oppose* OR object* OR annoy* OR dissatisf* OR disadvantage* OR degrad*) AND (((“dynamic allocation” OR “enhanced dynamic allocation” OR EDA) /10 (AdX OR “Google Ad Exchange” OR AdSense OR AdMob OR DFP OR “DoubleClick for Publishers” OR “Google Ad Manager” OR “GAM”)))
((“Dynamic Allocation” /25 ((“work together” OR integrat* OR interact* OR interop* OR unif* OR combin* OR consolidat* OR incorporat* OR join* OR link* OR interfac*) /15 (AdX OR “Google Ad Exchange” OR AdSense OR AdMob OR DFP OR “DoubleClick for Publishers” OR “Google Ad Manager” OR “GAM”)))
((“Header bidding” OR HB OR prebid) /10 (effect* OR impact* OR affect* OR counter* OR fight* OR “respond to” OR “new product” OR “compete with” OR revenue OR threat OR “exchange bidding” or EBDA or “open bidding”))
((“Header bidding” OR HB OR prebid) /10 (#test OR #study OR report OR #analysis) AND (#Effective OR #Abandon OR latency))
((complain* OR angry OR mad OR upset* OR problem* OR unfair OR exploit* OR leverage* OR harm* OR hurt* OR protest* OR oppose* OR object* OR annoy* OR dissatisfied OR dissatisfaction OR disadvantage* OR degrad*) /15 (“exchange bidding” OR “open bidding” OR EBDA))
((“exchange bidding” OR “open bidding” OR EBDA) /10 (impact* OR affect* OR result* OR increas* OR higher OR decreas* OR declin* OR reduc* OR low*) /15 (revenue* OR profit* OR yield* OR return* OR spend* OR fee* OR rate* OR charge* OR cost*))
((“AMP” OR (“accelerated mobile” /1 Page) OR “AMP Project” OR “AMP Page”) /10 ((govern* OR authority OR “steering committee” OR TSC OR “advisory committee” OR “AC”) /10 (criteria* OR standard* OR rule* OR participat* OR join*)))

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(("AMP" OR ("accelerated mobile" /1 Page) OR "AMP Project" OR "AMP Page") /10 (expenditure OR finance OR "P&L" OR "pay for" OR underwrit* OR bankroll* OR subsidiz*))
(("AMP" OR ("accelerated mobile" /1 Page) OR "AMP Project" OR "AMP Page") /10 ("Behavioral data" OR (Data /15 collect*)))
(("AMP" OR ("accelerated mobile" /1 Page) OR "AMP Project" OR "AMP Page") /10 ((revenue* or profit*) w/1 (boost* OR increas* OR enhanc* OR goose* OR juice* OR surg* OR skyrocket* OR grow* OR drop* OR decreas* OR limit* OR declin* OR shrink* OR dwindle* OR "falling off" OR "fall off")))
(("AMP" OR ("accelerated mobile" /1 Page) OR "AMP Project" OR "AMP Page") /10 ("alternative to" OR "potential alternative" OR "build versus buy" OR "build vs buy" OR "build vs. buy" OR "better option" OR "superior to"))
(("AMP" OR ("accelerated mobile" /1 Page) OR "AMP Project" OR "AMP Page") /10 (cookie* /10 match* OR track* OR Newton OR Potassium))
(("AMP" OR ("accelerated mobile" /1 Page) OR "AMP Project" OR "AMP Page") /10 ((rank* OR position OR factor* OR place*) /15 (algo* OR "SERP" OR "search engine" /1 result*)))
(("non-AMP" OR (normal /1 (page* or site*))) /10 (carousel*))
(("AMP" OR ("accelerated mobile" /1 Page) OR "AMP Project" OR "AMP Page") /10 (Cache /10 (google.com OR ampproject.com OR cloudflare)))
(("AMP" OR ("accelerated mobile" /1 Page) OR "AMP Project" OR "AMP Page") /10 (Data /10 ("third-party" OR "third party" OR 3P) /5 analytic*))
(("AMP" OR ("accelerated mobile" /1 Page) OR "AMP Project" OR "AMP Page") /10 ((harm* OR hurt* OR reduc* OR disadvantage* OR degrad* OR disfavor*) /15 (*compet* OR publishers OR pubs OR websites OR sites)))
(("AMP" OR ("accelerated mobile" /1 Page) OR "AMP Project" OR "AMP Page") /10 (Prebid /10 (relation* OR control* OR influenc* OR affect* OR effect*)))

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(("AMP" OR ("accelerated mobile" /1 Page) OR "AMP Project" OR "AMP Page") /10 ((affect* OR change* OR impact*) /15 ((traffic* OR visit*) /15 (pubs* OR publishers*))))
(("AMP" OR ("accelerated mobile" /1 Page) OR "AMP Project" OR "AMP Page") /10 ("ampletter.org" OR "A letter about Google AMP" OR "open letter"))
("Privacy Policy" /25 (DFP OR "DoubleClick For Publishers") AND (chang* OR alter* OR plan* OR decid* OR complain* OR angry OR "mad" OR upset* OR problem* OR unfair OR exploit* OR leverage* OR harm* OR hurt* OR protest* OR oppose OR object* OR annoy* OR dissatisfied OR dissatisfaction OR disadvantage* OR degrad* OR disfavor*))
(Chrome AND (cookie* AND (track* OR sync* OR match* OR monitor* OR follow*)) AND ("third-part" OR (third /1 part*) OR 3P*) AND ("cross site" OR "cross-site" OR "across site" OR (multiple /3 site*) OR #track OR sync* OR Newton OR Potassium))
("Privacy Policy" /10 (chang* OR alter* OR plan* OR decid* OR complain* OR angry OR "mad" OR upset* OR problem* OR unfair OR exploit* OR leverage* OR harm* OR hurt* OR protest* OR oppose OR object* OR annoy* OR dissatisfied OR dissatisfaction OR disadvantage* OR degrad* OR disfavor*))
(acqui* OR merg* OR "M&A" OR buy OR purchase OR Market OR markets OR marketplace OR marketshare OR monopol* OR compet* OR "market share" OR barrier* OR entry OR enter OR enters OR entered OR overlap* OR expansion OR expand* OR demand OR supply OR steal* OR stole OR switch* OR dominat* OR exit* OR loyal OR incumb* OR substit* OR rival* OR uncompetitive OR weak* OR reposition* OR predatory OR maverick OR replace* OR disrupt* OR enemy OR synerg* OR efficien*) w/15 (DoubleClick OR DART OR "DoubleClick for publishers" OR DFP OR "Decision Engine" OR DE OR "Unified Advertiser Suite" OR DFA OR (DoubleClick w/5 ("Ad Exchange" OR AdX)) OR DBM OR DCM OR Googleclick OR DCLK)
((acqui* OR merg* OR "M&A" OR buy OR purchase OR Market OR markets OR marketplace OR marketshare OR monopol* OR compet* OR share* OR barrier* OR entry OR enter OR enters OR entered OR overlap* OR expansion OR expand* OR win OR winning OR won OR wins OR lose OR lost OR loss OR demand OR supply OR steal* OR stole OR switch* OR dominat* OR exit* OR loyal OR incumb* OR substit* OR rival* OR uncompetitive OR weak* OR reposition* OR predatory OR maverick OR replace* OR disrupt* OR enemy OR synerg* OR efficien*) w/20 admob)
((acqui* OR merg* OR "M&A" OR buy OR purchase OR Market OR markets OR marketplace OR marketshare OR monopol* OR compet* OR share* OR barrier* OR entry OR enter OR enters OR entered OR overlap* OR expansion OR expand* OR win OR winning OR won OR wins OR lose OR lost OR loss OR demand OR supply OR steal* OR stole OR switch* OR dominat* OR exit* OR loyal OR incumb* OR substit* OR rival* OR uncompetitive OR weak* OR reposition* OR predatory OR

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maverick OR replace* OR disrupt* OR enemy OR synerg* OR efficien*) w/20 (AdMeld OR FireMeld OR “project Seventeen” OR “project 17”))
((acqui* OR merg* OR “M&A” OR buy OR purchase OR Market OR markets OR marketplace OR marketshare OR monopol* OR compet* OR share* OR barrier* OR entry OR enter OR enters OR entered OR overlap* OR expansion OR expand* OR win OR winning OR won OR wins OR lose OR lost OR loss OR demand OR supply OR steal* OR stole OR switch* OR dominat* OR exit* OR loyal OR incumb* OR substit* OR rival* OR uncompetitive OR weak* OR reposition* OR predatory OR maverick OR replace* OR disrupt* OR enemy OR synerg* OR efficien*) w/20 (“Invite Media” OR (Invite w/10 “Bid Manager”)))
(AdWords OR “Google Ads” OR GDN OR “Google Display Network” OR “Google Ad Exchange” OR “Google Ad Manager” OR GAM) w/20 (AdSense OR AdX) w/20 ((certif* w/15 network*) OR limit OR requir* OR urge* OR push* OR mandatory OR involve*)
(complain* OR angry OR mad OR upset* OR problem* OR unfair OR exploit* OR leverage* OR harm* OR hurt* OR protest* OR oppose* OR object* OR annoy* OR dissatisf* OR disadvantage* OR degrad* OR disfavor*) w/20 ((AdWords OR “Google Ads”) w/20 ((auction* OR bid* OR select* OR pick* OR chose* OR proc* OR method) w/20 (win* OR optimiz* OR outbid* OR award*)))
(complain* OR angry OR mad OR upset* OR problem* OR unfair OR exploit* OR leverage* OR harm* OR hurt* OR protest* OR oppose* OR object* OR annoy* OR dissatisf* OR disadvantage* OR degrad* OR disfavor*) AND (Smart w/3 Pric*)
(complain* OR angry OR mad OR upset* OR problem* OR unfair OR exploit* OR leverage* OR harm* OR hurt* OR protest* OR oppose* OR object* OR annoy* OR dissatisf* OR disadvantage* OR degrad* OR disfavor*) w/20 (“DoubleClick for Publishers” OR DFP OR “Ad Manager” OR GAM)
(“DoubleClick for Publishers” OR DFP OR “Ad Manager” OR GAM) w/20 (direct* w/5 (sale OR sold OR sell OR inventory))
(“small business” OR “small biz” OR SMB OR SB) w/20 (free OR charge OR pric* OR cost OR fee* OR revenue* OR profit OR monetiz* or optimiz* or scale*)
(“DFP Premium” OR DFPP OR Premium OR “DoubleClick for Publishers Premium”) w/20 (free OR charge OR pric* OR cost OR fee* OR revenue OR profit* OR monetiz* OR optimiz* OR scale* OR AdSense OR AdX OR “Ad Exchange” OR DRX OR GAM OR “Google Ad Manager”)
((Market OR markets OR marketplace OR “market share” OR monopol* OR compet* OR share* OR barrier* OR entry OR enter OR enters OR entered OR overlap* OR expansion OR expand* OR win OR winning OR won OR wins OR lose OR lost OR loss OR demand OR supply OR steal* OR stole OR switch* OR dominat* OR exit* OR loyal OR incumb* OR substit* OR rival* OR uncompetitive OR weak* OR reposition* OR predatory OR maverick OR replace* OR disrupt* OR enemy) w/20 (“Trade Desk” OR “TheTradeDesk” OR “TradeDesk” OR TTD OR DataXu OR “Data Xu” OR Adform OR (Verizon w/3 (“ad network” OR DSP OR SSP OR Exchange OR “ad server” OR DMP)) OR “Oath Ad

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“Strategy Book” OR “Strategy Charter”

DV360 w/30 (discount* OR pricing OR price* OR bundle* OR rebate* OR incentiv* OR “rate card” OR remuneration OR refund* OR allowance* OR concession*)

(complain* OR angry OR mad OR upset* OR problem* OR unfair OR exploit* OR leverage* OR harm* OR hurt* OR protest* OR oppose* OR object* OR annoy* OR dissatisf* OR disadvantage* OR degrad* OR disfavor*) w/20 (“DoubleClick Bid Manager” OR DBM OR “Google Marketing Platform” OR GMP OR “Audience Center” OR GAC)

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(complain* OR angry OR mad OR upset* OR problem* OR unfair OR exploit* OR leverage* OR harm* OR hurt* OR protest* OR oppose* OR object* OR annoy* OR dissatisf* OR disadvantage* OR degrad* OR disfavor*) w/20 (attribut* OR last-click OR “last click” OR last-impression OR “last impression”)
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(complain* OR angry OR mad OR upset* OR problem* OR unfair OR exploit* OR leverage* OR harm* OR hurt* OR protest* OR oppose* OR object* OR annoy* OR dissatisf* OR disadvantage* OR degrad* OR disfavor*) w/20 (“Server to Server” OR sever-to-server OR S2S OR server-side OR “server side”)
(“Exchange Bidding” OR “Open Bidding” OR EB OR EBDA OR OB) w/20 (exchange* OR OpenX OR AppNexus OR Rubicon OR Pubmatic OR Telaria OR “Verizon Media” OR (Verizon w/3 exchange) OR Oath OR Teads OR FBX OR InMobi OR MoPub OR Ooyala OR “Transparent Ad Marketplace” OR “Unified Ad Marketplace” OR “Index Exchange” OR Adform OR SpotX OR Epom)
(“Exchange Bidding” OR “Open Bidding” OR EB OR EBDA OR OB) AND (Publisher* OR pub*) AND ((ad OR ads) w/20 (spend* OR revenue* OR profit OR budget OR allocat*))
(“Exchange Bidding” OR “Open Bidding” OR EB OR EBDA OR OB) w/20 (fee OR fees OR cost* OR charg* OR cut OR percentag* OR % OR pric* OR pay OR paid)
(advantage* OR edge OR superior OR “upper hand” OR benefit* OR more OR better) AND ((Data OR GAIA OR nera OR narnia) w/25 (collect* OR target* OR track* OR monetiz* OR monetis*)) AND ((across OR cross OR “cross-”) w/4 (device* OR platform* OR system*))
(complain* OR angry OR mad OR upset* OR problem* OR unfair OR exploit* OR leverage* OR harm* OR hurt* OR protest* OR oppose* OR object* OR annoy* OR dissatisf* OR disadvantage* OR degrad* OR disfavor*) AND (AdMob w/20 (SDK* OR “Software Dev Kit” OR “Software Development Kit”)) AND inventory
(“login” OR “log in” OR “log-in” OR user* OR “sign-in” OR “sign in” OR “signed-in” OR “signed in” OR GAIA) AND (data w/25 (collect* OR target* OR track* OR monetiz* OR Monetis*)) AND ((across OR cross OR cross-) w/4 (device* OR platform* OR system*))
(Chrome AND (((“third-part” OR (third /1 part*) OR 3P OR 3Ps OR 3PAT) /15 (#track* OR sync* OR match* OR monitor* OR follow* OR optimiz*)) AND ((multiple OR across OR cross- or cross*) /3 (site* OR website* OR platform* OR browser* OR application* OR app OR apps)) AND (cookie* OR data OR user*)) OR (Chrome AND (Newton OR Potassium))

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“Ads Council Meeting” OR ACM OR “Global Partnerships Cross-Functional Review” OR GPX OR
“Global Buy-Side Cross-Functional Review” OR “GBX” OR “Functional Management Group Deal
Review” OR “FMG Deal Review” OR “Business Council Deal Review” OR “BC Deal Review” OR
“Executive Committee” OR “Exec Comm”

[Appendix B intentionally omitted]